201356

#### Law Offices

### VUONO & GRAY, LLC

John A. Vuono William A. Gray Mark T. Vuono Dennis J. Kusturiss Christine M. Dolfi Louise R. Schrage Susan C. Indrisano \*Also Admitted in Florida +Also Admitted in Maryland

2310 Grant Building

Pittsburgh, PA 15219-2383

March 6, 2003

Richard R. Wilson of Counsel

Telephone 412-471-1800

Faceimile

412-471-4477

Re:

Railroad Ventures, Inc. - Abandonment Exemption

- Between Youngstown, OH and Darlington, PA in Mahoning and Columbiana Counties, OH and Beaver County, PA and

Docket No: AB-556 (Sub No 2X);

Our File 4431-1-1

Vernon A. Williams Secretary Surface Transportation Board 1925 K Street, N.W. Washington, DC 20423-0001 **BY FACSIMILE** (202-565-9004) ORIGINAL BY FEDERAL EXPRESS

Dear Mr. Williams:

Enclosed for filing please find a Motion for Extension of Time filed on behalf of Railroad Ventures, Inc. ("RVI") in the above captioned proceeding seeking an additional fourteen day extension of time until April 11, 2003, within which to respond to the Joint Motion seeking Final Closure of Escrow Account filed by Columbiana County Port Authority/Central Columbiana and Pennsylvania Railroad Company.

Copies of this Motion for Request for Extension of Time have been served on all parties of record and is not objected by opposing counsel.

Please acknowledge receipt and filing of the enclosed on the duplicate copy of this letter of transmittal and return it to the undersigned in the self-addressed stamped envelope provided.

Office of Proceedings

Very truly yours,

MAR - / 2003

Part of Public Record

pZ/25055

**Enclosures** 

Railroad Ventures, Inc.

All Parties of Record

#### **BEFORE THE** SURFACE TRANSPORTATION BOARD



Docket No. AB-556 (Sub No. 2X)

#### RAILROAD VENTURES, INC. - ABANDONMENT EXEMPTION BETWEEN YOUNGSTOWN, OHIO AND DARLINGTON, PA IN MAHONING AND COLUMBIANA COUNTIES, OHIO AND BEAVER COUNTY, PA

#### MOTION FOR EXTENSION OF TIME

Richard R. Wilson, Esq. Attorney for Railroad Ventures, Inc.

**VUONO & GRAY, LLC** 2310 Grant Building Pittsburgh, PA 15219 (412) 471-1800

Date: March 6, 2003

## BEFORE THE SURFACE TRANSPORTATION BOARD

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Docket No. AB-556 (Sub No. 2X)

RAILROAD VENTURES, INC. - ABANDONMENT EXEMPTION BETWEEN YOUNGSTOWN, OHIO AND DARLINGTON, PA IN MAHONING AND COLUMBIANA COUNTIES, OHIO AND BEAVER COUNTY, PA

#### MOTION FOR EXTENSION OF TIME

On January 21, 2003 Columbiana County Port Authority ("CCPA") and the Central Columbiana and Pennsylvania Railroad Company ("CCPR") filed a Petition seeking approval of escrow fund expenditures for rehabilitation work performed on the former Youngstown & Southern Railroad. By order dated February 3, 2003 the Board permitted Railroad Ventures, Inc. ('RVI") to file a response to this Petition on March 14, 2003 in order for its consultant to have adequate time to audit and field check the work completed by CCPR.

Attached as Exhibit A is a letter dated March 4, 2003 from RVI's consultant indicating that as a consequence of the heavy snowfalls in recent weeks he has been unable to conduct field inspections and has requested an additional two weeks in which to perform said inspections.

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VUONO AND GRAY

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Accordingly, RVI respectfully requests that the Board extend its current response date from March 14, 2003 to April 11, 2003. This will provide Mr. Wehner an adequate opportunity to conduct his inspections and incorporate his findings into his audit report.

I have notified Attorney O'Brien of this extension request and he has no objection to it.

Respectfully submitted,

VUONO & GRAY, LLC

Richard R. Wilson

Attorney for Railroad Ventures, Inc.

VUONO & GRAY, LLC 2310 Grant Building Pittsburgh, PA 15219 412-471-1800

Dated: March 6, 2003

/25056

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 6<sup>th</sup> day of March, 2003 served a copy of the Motion for Request for Extension of Time upon the following by First Class United States Mail, postage prepaid:

Keith G. O'Brien, Esq. Rea, Cross & Auchincloss Suite 570 1707 L Street, N.W. Washington, D.C. 20036

Richard H. Streeter, Esq. Barnes & Thornburg 750 17<sup>th</sup> Street, N.W. Suite 900 Washington, DC 20006

Richard R. Wilson

Attorney for Railroad Ventures, Inc.



# R/W Specialists, Inc. George D. Wehner, ASA

March 4, 2003

Mr. Richard R. Wilson, Esq. Vuono & Gray, LLC 2310 Grant Street Pittsburgh, PA 15219-2383

Re: Y&S Audit

Dear Mr. Wilson:

My work is progressing on schedule, with the exception of a field inspection of the work completed by the Central Columbiana & Pennsylvania Railway. We have been snow covered for almost 6 weeks. The weather forecasters are predicting a spring thaws very soon. I would like to request a two week extension in order to inspect the track and crossing work.

Sincerely,

George D. Wehner

Railroad Consultant

5721 Pine Tree St., West, Suite B, Columbus Ohio 43229
Telephone: (614) 848-6186 Fax: (614) 846-6608 email: gwehner@insight.rr.com

EXHIBIT A

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## Law Offices VUONO & GRAY, LLC

2310 Grant Building Pittsburgh, PA 15219-2383

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#### FACSIMILE COVER SHEET

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Date: March 6, 2003

Time:

Pages (Including cover):

7

#### PLEASE DELIVER TO:

Name:

Vernon A. Williams, Secretary

Company:

Surface Transportation Board

Address:

Fax No.:

202-565-9004

FROM:

Attorney:

Richard R. Wilson

Client/Case:

Railroad Ventures, Inc.-Abandonment Exemption

File No.:

4431-1-1

#### **COMMENTS:**

If error in transmission, call Donna at 412-471-1800.

Original will be mailed. Copy: Case file; Attorney's daily file.

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